

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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September 27, 2021

**BY ECF**

The Honorable Judge Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**MEMO ENDORSED**

**RE: United States v. Desirae Schneider  
20 Cr. 325 (SHS)**

Dear Judge Stein:

I write to request a temporary modification to Desirae Schneider's bail conditions in the above-captioned case to allow Ms. Schneider to travel to Denver, CO by car to attend a friend's event from Thursday, October 14, 2021 through Monday, October 18, 2021. Pretrial services and the Government take no position with respect to this request.

On March 16, 2020, Ms. Schneider was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pre-trial supervision and mental health treatment as directed; surrender of travel documents with no new applications and travel restricted to the Southern District of New York; no contact with the alleged victim outside the presence of counsel; surrender keys to the complainant's home; continued employment; no "dark web" use; no possession of firearms/destructive devices/other weapons; and GPS monitoring.

On April 12, 2021, Ms. Schneider pled guilty to the one-count indictment and remained out on bond. On June 30, 2021, the Court held Ms. Schneider's sentencing hearing but has not yet imposed a sentence. The Court modified Ms. Schneider's conditions of release to include drug testing and treatment as directed by pretrial services. Ms. Schneider's sentencing is currently scheduled for November 3, 2021.

Since Ms. Schneider's release, she has made a series of requests for temporary bail modifications permitting her to travel out of the district (primarily to Astoria, Queens, only 15

minutes away from her home) with no objection from pretrial services or the Government. For the past year, she has remained in constant compliance with the conditions of her release. Most recently, in July 2021, with the Court's permission Ms. Schneider moved from New York to live with her parents in Illinois pending sentencing.

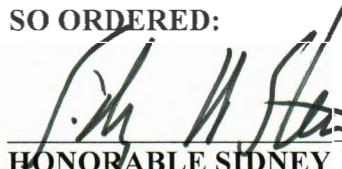
Ms. Schneider now respectfully requests a temporary bail modification to allow her to travel to Denver, CO by car to attend a friend's event from Thursday, October 14, 2021 through Monday, October 18, 2021. Pretrial services and the Government take no position with respect to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/  
Marne L. Lenox  
Assistant Federal Defender  
(212) 417-8721

Dated: New York, New York  
September 27, 2021

SO ORDERED:  
  
HONORABLE SIDNEY H. STEIN  
United States District Judge

cc: Rebecca Dell, Assistant U.S. Attorney  
Jonathan Lettieri, Pretrial Services Officer